

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

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In Re:

MOTION TO AVOID LIENS

RONIE L. VANHORN

CASE NO.: 18-21124

Debtor,
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“PURSUANT TO FRBP 9014 AND THE STANDING ORDERS IMPLEMENTING DEFAULT PROCEDURES IN ROCHESTER; IF YOU INTEND TO OPPOSE THE MOTION, AT MINIMUM, YOU MUST SERVE: (1) THE MOVANT AND MOVANT’S COUNSEL, AND (2) IF NOT THE MOVING PARTY (A) THE DEBTOR AND DEBTOR’S COUNSEL; AND (B) IN A CHAPTER 11 CASE, THE CREDITOR’S COMMITTEE AND ITS ATTORNEY, OR IF THERE IS NO COMMITTEE, THE 20 LARGEST CREDITORS; AND (C) ANY TRUSTEE. IN ADDITION, YOU MUST FILE WITH THE CLERK OF THE BANKRUPTCY COURT WRITTEN OPPOSITION TO THE MOTION NO LATER THAN THREE (3) BUSINESS DAYS PRIOR TO THE RETURN DATE OF THE MOTION NOTWITHSTANDING THE DECEMBER 1, 2009 AMENDMENTS TO FRBP 9006(a). IN THE EVENT THAT NO WRITTEN OPPOSITION IS SERVED AND FILED, NO HEARING ON THE MOTION WILL BE HELD ON THE RETURN DATE AND THE COURT WILL CONSIDER THE MOTION UNOPPOSED.”

PLEASE TAKE NOTICE, that upon the affirmation of counsel dated December 4, 2018, Ronie L. Vanhorn, the debtor herein, by his attorneys, Legal Assistance of Western New York, Inc., Mark H. Wattenberg of Counsel, will make a motion before the Court on December 20, 2018, at 10:00 a.m. at the US Bankruptcy Court, 100 State Street, Rochester, New York , for an order pursuant to 11 U.S.C. §522(f), for the cancellation and avoidance of judicial liens, on the ground that such liens impair Debtor’s homestead exemption.

Dated: December 4, 2018
Bath, New York

/s/ Mark H. Wattenberg

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